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From: Christopher Cora/R10/USEPA/US

To: Jayne Allen <Jayne.Allen@pgn.com>

Delivered Date: 02/01/2011 11:41 AM PST

Subject: Fw: Harbor Oil : BES Response to EPA Request

Jayne,

Below is the city of Portland response to the inclusion of data from their July 30, 2009 presentation, which we have included in the Draft Final RI.

Christopher Cora,
Project Manager
U.S. Environmental Protection Agency
Region 10
1200 6th Ave, Suite 900, ECL-115
Seattle, WA 98101-3140
(206) 553-1478
Fax: (206) 553-0124/0957

----- Forwarded by Christopher Cora/R10/USEPA/US on 02/01/2011 11:39 AM -----

From: "Barthel, Susan" <SUSAN.BARTHEL@portlandoregon.gov>

To: Christopher Cora/R10/USEPA/US@EPA

Cc: "Betz, Jan" <Jan.Betz@portlandoregon.gov>, "Applegate, Rick" <Rick.Applegate@portlandoregon.gov>, "Hendrickson, Nancy" <NANCY.HENDRICKSON@portlandoregon.gov>, "SEIDEL Paul" <SEIDEL.Paul@deq.state.or.us>, "Anderson.Jim@deq.state.or.us" <Anderson.Jim@deq.state.or.us>, (b) (6) "tomcalabrese@h2ogeo.com" <tomcalabrese@h2ogeo.com>, "rose@yakama.com" <rose@yakama.com>, "McAllister, David" <David.McAllister@portlandoregon.gov>, "Lofgren, Todd" <Todd.Lofgren@portlandoregon.gov>, "Rosen, Mike" <Mike.Rosen@portlandoregon.gov>, "Struck, Rod" <Rod.Struck@portlandoregon.gov>, "erin.madden@gmail.com" <erin.madden@gmail.com>, Deb Yamamoto/R10/USEPA/US@EPA

Date: 02/01/2011 11:32 AM

Subject: FW: Harbor Oil : BES Response to EPA Request

Chris,

This email is in response to your email to Rod Struck regarding the City of Portland's interpretation of the data presented in Section 4.4.3.1 (Urban PCB Concentrations in Stormwater) and Section 4.4.3.2 (Comparison of General PCB Information to Study Area Concentrations) and a request for a copy of the City's July 30, 2009 presentation at EPA's PCB work shop. Please find attached to this email:

- *PCB Source Identification in Stormwater Conveyance Systems -- Portland Harbor*. Presentation given by Dawn Sanders, City of Portland Bureau of Environmental Services, at the EPA PCB

Work Shop on July 30, 2009.

- Selected pages from the Draft Final Harbor Oil Remedial Investigation (RI) Report (dated September 1, 2010) including
- Sections 4.4.3 - 4.4.4 (pp. 212 -214) regarding Urban PCB Concentrations in Stormwater, and
- Sections 4.6.4 - 4.6.5 (pp. 277 - 283) regarding Urban DDT Concentrations in Stormwater.

Much of the information presented in the RI sections listed above is new and was added by the Voluntary Group (shown in redline as added text). It is the City's opinion that much of the new information is misleading and irrelevant to understanding how documented hazardous substance sources and releases at the Harbor Oil site have impacted the environment (e.g., Force Lake, North Lake, adjacent wetlands) and the potential risks to human health and the environment posed by these releases. The evaluation of the Harbor Oil site should be based on site specific facts and data. Information about other contaminated sites (e.g. Section 4.6.4.1) is extraneous and should not influence risk management decisions at this site. If EPA allows this information to remain in the RI, the City requests that it be limited to factual information and that all speculative statements be removed.

The presentation of the Portland Harbor stormwater solids data in the Draft Final RI is inaccurate and incorrect. The concentrations presented are not "typical urban levels" as stated. The Portland Harbor Superfund site was designated as such due to a number of significant industrial upland sites (including a former DDT manufacturer) within the study area. The stormwater solids sample results presented in the attached pages of Draft Final Harbor Oil RI were collected from within the Portland Harbor Superfund Study Area and likely reflect impacts associated with stormwater runoff, vehicular drag out, or air deposition from these known significant upland sources. The Portland Harbor data were developed primarily to evaluate contaminant loading to the Willamette River within the Portland Harbor Study Area. The implication that these concentrations are typical elsewhere in Portland is incorrect. It is the City's opinion that this Portland Harbor data and all related statements throughout the RI should be deleted.

The attached pages from the RI include additional City notes and comments regarding these data.

The City appreciates the opportunity to provide this clarification. We look forward to your attention to the concerns raised regarding the use of this data. If you have any questions, please contact me at (503) 823-7268. If you have specific questions about the City's presentation or the stormwater solids data presented in the Draft Final Harbor Oil Remedial Investigation, please call Dawn Sanders with the City's Portland Harbor Superfund Program at (503) 823-7263 or email her at: Dawn.Sanders@portlandoregon.gov.

Regards,

Susan Barthell
Columbia Slough Watershed Program

-----Original Message-----

From: Cora.Christopher@epamail.epa.gov [<mailto:Cora.Christopher@epamail.epa.gov>]

Sent: Wednesday, January 05, 2011 9:48 AM

To: Struck, Rod

Subject: Fw: Sediment values, Harbor Oil

Rod,

This email was returned, I used your email provided on the attendee list from the December 15, 2010 Harbor Oil meeting.

Christopher Cora,

Project Manager
U.S. Environmental Protection Agency
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----- Forwarded by Christopher Cora/R10/USEPA/US on 01/05/2011 09:46 AM

Delivery Failure Report

Your Sediment values, Harbor Oil
message:

was not Rod.Struck@portland.gov
delivered to:

because: Host or domain name not found. Name service error for
name=portland.gov type=A: Host not found

EPAHUB11/USEPA/US, R10MAIL1/R10/USEPA/US

To: Paul SEIDEL <paul.seidel@state.or.us> (b) (6)
Rod.Struck@portland.gov

cc: Joe Goulet/R10/USEPA/US@EPA, Suzanne Skadowski/R10/USEPA/US@EPA,
Jayne Allen <Jayne.Allen@pgn.com>

Date: 09:28:19 AM Today

Subject: Sediment values, Harbor Oil

During the 12/15 meeting a concerned party asked about whether EPA uses TEC/PEC values for setting cleanup standards, or triggering the need for remediation. I would like to recommend you review the Macdonald, Ingersoll, and Berger article from 2000 "Development and Evaluation of Consensus-Based Sediment Quality Guidelines for Freshwater Ecosystems, Arch. Environ. Contaminant Toxicol. 39(5). This paper discusses the development of SQS's from a variety of sources. My primary concern, based on issues raised by the HOCAG and ODEQ, as well as others is that there is a mis-representation of how the values used to screen media are being utilized. I recommend this paper for your review to compare values we observed in sediments at Harbor Oil. In particular the PCB and DDT values at the Site are ALL below the Consensus Based PEC values. We used the TEC values from that paper for screening, that is highly conservative and does not imply they should be cleanup values. In fact TECs are specifically not to be used for setting cleanup values. I request that you review this with your technical advisors and respond with your Agency, or technical advisors position on why EPA would be required to cleanup sediments which do not exceed a probable effect value. (I recognize these do not address bioaccumulation, but that has been addressed through our risk assessments).

I also request the City of Portland to provide their interpretation of the Data presented in Sections 4.4.3.1 and 4.4.3.2 of the Draft Final RI. and whether the values are incorrect or if the City believes they text misrepresents the information provided by the City of Portland Bureau of Environmental Services at the cited July 30, 2009 meeting. At a minimum, EPA requests the City to provide the referenced presentation provided by the Bureau of Environmental Services on July 30, 2009.

Christopher Cora,
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PCB pages from Draft Final RI_Sept-1-2010.pdf



DDT pages from Draft Final RI_Sept-1-2010-2.pdf



EPA PCB Workshop 30Jul09_City.pdf